



AIR QUALITY PERMIT TO CONSTRUCT/OPERATE 12-103-588

In accordance with the provisions of the Mecklenburg County Air Pollution Control Ordinance,

PERMISSION IS HEREBY GRANTED TO

COMPANY NAME	FACILITY LOCATION
Industrial Container Services – NC, LLC	Industrial Container Services – NC, LLC (Matthews) 3212 Campus Ridge Road, Matthews, NC 282105

FOR THE INSTALLATION AND OPERATION OF

A steel drum reconditioning operation with associated air emission sources as listed in the emission source table.

Industrial Container Services – NC, LLC shall be subject to the General and Specific Conditions and Limitations, Emission Limits, Monitoring Requirements, Reporting and Recordkeeping Requirements contained herein.

This Permit shall be effective from the date of its issuance unless modified or void/revoked.

Appendices A and B are included to provide information relevant to this Permit.

Air Quality Program Manager

Date

EMISSION SOURCE TABLE

Facility Name: Industrial Container Service –NC, LLC (Matthews)

Facility Address: 3212 Campus Ridge Road, Matthews, NC 28105

Permit to Construct/Operate No.: 12-103-588

Date Issued: May 9, 2012

Emission Source ID	Emission Source Description	Installation (I), Modification(M) Dates	Control Device (ID) or Method	Permitted Pollutant(s) Emitted from Emission Source	Applicable Specific Conditions and Limitations
<u>Surface Coating Operation</u>					
ES-1	<u>Exterior Coating Process:</u> One lid coating dry filter spray booth, one drum coating combination dry filter/water wash spray booth, and associated conveying equipment	I=1969 M=1985	None	VOC, HAPs, TAPs	S-1, S-4, S-5, S-6, S-11
ES-2	<u>Interior Coating Process:</u> One lid lining dry filter spray booth, one drum lining dry filter spray booth and associated conveying equipment	I=1969	None	VOC, HAPs, TAPs	S-1, S-4, S-5, S-6, S-11
ES-3	<u>Dip Tank Coating Process:</u> One open face dip tank for applying coatings to drum rings	I=1969	None	VOC, HAPs, TAPs	S-1, S-4, S-5, S-6, S-11
<u>Shot Blasting Operation</u>					
ES-5	A drum shot blasting process consisting of one Wheelabrator horizontal drum cleaning machine.	I=1969 R=2002 R=2012	CD-06: One Wheelabrator Dust Collector for particulate control.	PM, PM ₁₀ , PM _{2.5}	S-1, S-2, S-6, S-7, S-8, S-10, S-11
ES-6	A drum lid cleaning process consisting of one Pangborn shot blast unit	I=1987 R=2002	CD-05: One US Filter Fabric Filter for particulate control.	PM, PM ₁₀ , PM _{2.5}	S-1, S-2, S-6, S-7, S-8, S-10, S-11

ES-8	A bung cleaning process consisting of one drum lid bung cleaner/tumbler	R=2002		PM, PM ₁₀ , PM _{2.5}	S-1, S-2, S-6, S-7, S-8, S-10, S-11
<u>Drum Furnace Operation</u>					
ES-7	A 55 gallon steel drum reconditioning process consisting of a conveyORIZED BAL-PAC-DRF Drum Reconditioning Furnace (primary chamber), Model DRF 250, equipped with a waste heat boiler (heat exchanger) to generate steam curtains	I=1996	CD-07: One afterburner (secondary chamber) for the control of particulate emissions, having a total heat input of 18.2 million Btu per hour and fueled by natural gas.	PM, PM ₁₀ , PM _{2.5} , NO _x , VOC, CO, HAPs	S-1, S-2, S-3, S-6, S-7, S-8, S-9, S-11

MECKLENBURG COUNTY AIR QUALITY

Air Quality Permit Conditions and Limitations

Facility Name: Industrial Container Services – NC, LLC (Matthews)
Facility Address: 3212 Campus Ridge Road, Matthews, NC 28105
Permit to Construct/Operate No.: 12-103-588

GENERAL CONDITIONS AND LIMITATIONS

ADMINISTRATIVE

- G-1. The facility shall be operated in accordance with the Mecklenburg County Air Pollution Control Ordinance (“MCAPCO”) including but not limited to the conditions specified herein and any other applicable State or Federal regulations.
- The provisions of this permit are severable. Upon any administrative or judicial challenge, or if any provision of this permit is held invalid, all permit requirements, except those being challenged, will remain valid and enforceable.
- G-2. Ownership of this permit is transferable to another party only by written approval by the Director. Application for ownership transfer shall be made by letter to the Director in accordance with **MCAPCO Regulation 1.5212 - “Applications”**, and accompanied by the applicable fee.
- G-3. Compliance with MCAPCO, including the specific conditions herein, shall be determined by source testing, surveillance, visual observations, data review, plant inspections, and any other methods applicable to the facility.
- G-4. The facility shall be operated in accordance with **MCAPCO Regulation 1.5211 - “Applicability”**. An owner or operator shall have received a permit from Mecklenburg County Air Quality (“MCAQ”) and shall comply with the conditions of such permit before constructing, modifying or operating any air pollution source or entering into a contract to construct or install any air cleaning device. This permit does not relieve the facility from the responsibility of acquiring any other permits that may be required.
- G-5. This permit and its conditions, unless otherwise stated, shall be applicable only to the items, processes and/or air pollution control equipment specifically enumerated herein.
- G-6. In accordance with **MCAPCO Regulation 1.5104 - “General Duties and Powers of the Director, With the Approval of the Board”**, the Director or his authorized representative may request performance testing of any emission source to ensure compliance.
- G-7. The owner or operator shall submit all reports or information as may be required by MCAQ.
- G-8. This permit may be revoked or modified as outlined in **MCAPCO Regulations 1.5232 - “Issuance, Revocation, and Enforcement of Permits”**, and **1.5231 - “Air Quality Fees”**. Instances which may result in such actions are as follows:
- A. Information submitted by the source on which this permit is based has been determined to be incorrect;
 - B. The regulations or conditions under which the permit was based change including but not limited to changes in surrounding land use and/or surrounding population and/or documented advances in scientific, medical or technical knowledge;
 - C. Violations of permit conditions listed herein;
 - D. Construction of the permitted equipment does not commence within 18 months of permit issuance or once construction has begun it ceases prior to completion for a period of 18 consecutive months;

- E. Operation of a permitted facility or process ceases permitted activities for a period of 18 consecutive months;
- F. Failure to pay the annual administering and compliance monitoring fee within 60 days after being billed;
- G. Refusal by the permittee to allow the Director or his authorized representative to enter the permittee's premises where a source of emissions is located, have access to records required to be kept under the terms and conditions of the permit, inspect any source of emissions, control equipment, and any monitoring equipment or method required in the permit or sample any emission source at the facility.
- H. Failure to pay a civil penalty within 20 days after the date that the permittee has been notified that the civil penalty has been finally assessed under MCAPCO Regulation 1.5304.

- G-9. Violation of any applicable MCAPCO regulation or condition listed herein could result in administrative fines and/or legal action as prescribed in **MCAPCO Section 1.5300 - "Enforcement; Variances; Judicial Review"**.
- G-10. The facility shall be operated in accordance with **MCAPCO Regulation 1.5211 - "Applicability"**, such that all activities exempted from permit requirements and/or not specifically listed on this permit shall still comply with any applicable requirement in MCAPCO.
- G-11. In accordance with **MCAPCO Regulation 1.5219 - "Retention of Permit at Permitted Facility"**, a copy of this permit shall be retained at the facility.
- G-12. The facility shall be operated in accordance with **MCAPCO Regulation 2.0304 - "Preplanned Abatement Program"**. A plan to reduce the emissions of air pollutants into the outdoor atmosphere during periods of an air pollution episode shall be maintained on the premises. The plan shall be consistent with good industrial practices and safe operating procedures, shall address varying degrees of hazard identified as air pollution alert, air pollution warning and air pollution emergency, and shall be made available to MCAQ within 30 days of such request.

OPERATIONAL

- G-13. The facility shall be operated in accordance with **MCAPCO Regulation 1.5214 - "Commencement of Operation"**. Upon completion of construction, alteration or installation pursuant to this permit, the permit holder shall notify the Director in writing of the completion date and the holder's intent to commence operation.
- G-14. The facility shall be operated in accordance with **MCAPCO Regulation 2.1110 - "National Emission Standards for Hazardous Air Pollutants"**, which refers to Title 40 of the Code of Federal Regulations Part 61.140 to 61.157, Subpart M, National Emission Standard for Asbestos, when conducting any renovation or demolition activities.
- G-15. Any stationary source subject to the Chemical Accident Prevention Provisions of **40 CFR Part 68** shall comply with such provisions and all applicable requirements of **MCAPCO Regulation 2.2103 - "Requirements"**, including but not limited to the submittal of a Risk Management Plan (Subpart G).
- G-16. The facility shall be operated in accordance with **MCAPCO Regulation 1.5107 - "Control and Prohibition of Visible Emissions"**, such that visible emissions shall not be more than 20% opacity for an aggregate of more than six (6) minutes in any one hour or more than twenty (20) minutes in any 24-hour period. Facilities subject to a visible emission standard as specified by applicability to **MCAPCO Regulations 2.0508, 2.0524, 2.1110, or 2.1111**, shall comply with the more stringent standard. In no case shall any source's visible emissions exceed 20% opacity.

- G-17. The facility shall be operated in accordance with **MCAPCO Regulation 1.5108 - “Dust and Related Material”**, such that dust shall not be discharged into the atmosphere in such quantities that the ambient air quality standards are exceeded at the property line or in such quantities or of such toxic or corrosive nature that may be injurious to humans or animals or may cause damage to the property of others.
- G-18. As required by **MCAPCO Regulation 2.0540 - “Particulates from Fugitive Dust Emission Sources”**, the permittee shall not cause or allow fugitive dust emissions to cause or contribute to substantive complaints.
- A. If fugitive dust emissions cause or contribute to substantive complaints, the permittee shall:
- (1) within 30 days upon receipt of written notification from the Director of a second substantive complaint in a 12-month period, submit to the Director a written report that includes the identification of the probable source(s) of the fugitive dust emissions causing complaints and what immediate measures can be made to abate the fugitive emissions;
 - (2) within 60 days of the initial report submitted under Subparagraph (1) of this Paragraph, submit to the Director a control plan as described in Paragraph (f) of this Regulation; and
 - (3) within 30 days after the Director approves the plan, be in compliance with the plan.
- B. The Director may require that the permittee develop and submit a fugitive dust control plan as described in MCAPCO 2.0540(f) if:
- (1) ambient air quality measurements or dispersion modeling as provided in Paragraph (e) of **MCAPCO Regulation 2.1106 – “Determination of Ambient Air Concentrations”** show violation or potential for a violation of an ambient air quality standard for particulates in MCAPCO Section 2.0400 - “Ambient Air Quality Standards”; or
 - (2) if MCAQ observes excessive fugitive dust emissions from the facility beyond the property boundaries for six minutes in any one hour using Reference Method 22 in 40 CFR 60, Appendix A
- G-19. The facility shall be operated in accordance with **MCAPCO Regulation 1.5109 - “Nuisance”**. The source shall not discharge any air contaminants or other material to cause injury, detriment, nuisance, annoyance, or endanger the comfort, repose, health or safety of public or property.
- G-20. Sources not regulated under **MCAPCO Regulations 2.0524 and 2.1110** shall be operated in accordance with **MCAPCO Regulation 2.0535 - “Excess Emissions Reporting and Malfunctions”** and **2.0605 – “General Recordkeeping and Reporting Requirements”**, and satisfactorily demonstrate to MCAQ that any excess emissions are the result of a malfunction, or the result of start-up or shut down and were unavoidable. The facility shall notify MCAQ of the occurrence of any excess emission lasting more than four hours and which result from a malfunction, a breakdown of process or control equipment or any other abnormal conditions as soon as practical but in all cases by 9:00 AM Eastern time of MCAQ’s next business day after becoming aware of the occurrence.
- G-21. **Odorous Emissions**
The facility shall be operated in accordance with **MCAPCO Regulation 1.5110 - “Control and Prohibition of Odorous Emissions”**. The owner or operator of a facility shall not operate the facility without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility’s boundary.
- If the Director determines that a source or facility is emitting an objectionable odor, the owner or operator shall be responsible for:
- providing the maximum feasible control determination according to the procedures in **MCAPCO Regulation 1.5113 - “Determination of Maximum Feasible Controls for Odorous Emissions”**, and

- implementing maximum feasible controls for the control of odorous emissions.

G-22. In accordance with **MCAPCO Section 1.5700 - “Toxic Air Pollutant Procedures”** and/or **Regulation 2.1104 - “Toxic Air Pollutant Guidelines”**, the toxic air pollutants (“TAP”) emitted by existing processes have been reviewed for regulatory applicability by MCAQ. If applicable, an Appendix A lists the associated TAPs.

In accordance with **MCAPCO Regulations 1.5111 - “General Recordkeeping: Reporting: Monitoring Requirements”**, **2.0605 – “General Recordkeeping and Reporting Requirements”**, and/or **2.0903 - “Recordkeeping: Reporting: Monitoring”**, the facility shall report any process additions, modifications or deletions which affect the emissions of any TAP listed in **MCAPCO Regulation 1.5711 - “Emission Rates Requiring a Permit”**, as prescribed by the following:

- A. If the process modifications will result in a facility-wide TAP emission rate that exceeds the rate listed in **MCAPCO Regulation 1.5711** for any TAP, apply and receive an air toxics permit before the process modification occurs; or
- B. If the process modifications will result in facility-wide TAP emission rates that are below the rates listed in **MCAPCO Regulation 1.5711**, submit the new emission rates to MCAQ 15 days prior to the initial change; or
- C. If the process modifications will not result in a net TAP emission increase, provide MCAQ with demonstration (15 days prior to the initial change) that the proposed modification will not result in a net TAP emission increase at the facility.

The facility is required to maintain documentation such that upon request by MCAQ, the facility can make a demonstration that facility-wide emissions of TAPs have or have not exceeded the rates listed in **MCAPCO Regulation 1.5711**.

SPECIFIC CONDITIONS AND LIMITATIONS

PROCEDURAL

S-1. Permit No. 07-006-588 shall be void upon issuance of this Permit.

EMISSION STANDARDS

S-2. The facility shall be operated in accordance with **MCAPCO Regulation 2.0515 - “Particulates from Miscellaneous Industrial Processes”**, such that particulate emissions from any stack, vent or outlet shall not exceed the allowable emission rate. The allowable emission rate shall be determined using the appropriate formula below:

$E = 4.10 * P^{0.67}$
For process weight rates greater than 30 tons/hr the following formula shall be used:
$E = 55.0 * P^{0.11} - 40$
E = maximum allowable emission rate for particulate matter in lbs/hr
P = process rate in tons/hr

S-3. The facility shall be operated in accordance with **MCAPCO Regulation 2.0516 - “Sulfur Dioxide Emissions from Combustion Sources”**, such that sulfur dioxide emissions from any vent, stack or chimney shall not exceed 2.3 pounds per million Btu input.

S-4. The facility shall be operated in accordance with **MCAPCO 2.0958 - “Work Practices For Sources Of Volatile Organic Compounds”**. The owner or operator of emission sources subject to this regulation shall:

- A. store all material, including waste material, containing volatile organic compounds in containers covered with a tightly fitting lid that is free of cracks, holes, or other defects, when not in use,
- B. clean up spills as soon as possible following proper safety procedures,
- C. store wipe rags in closed containers,
- D. not clean sponges, fabric, wood, paper products, and other absorbent materials,
- E. drain solvents used to clean supply lines and other coating equipment into closable containers and close containers immediately after each use,
- F. clean mixing, blending, and manufacturing vats and containers by adding cleaning solvent, closing the vat or container before agitating the cleaning solvent. The spent cleaning solvent shall then be poured into a closed container.

When cleaning parts, the owner or operator of any facility subject to this Regulation shall:

- A. flush parts in the freeboard area,
- B. take precautions to reduce the pooling of solvent on and in the parts,
- C. tilt or rotate parts to drain solvent and allow a minimum of 15 seconds for drying or until all dripping has stopped, whichever is longer,
- D. not fill cleaning machines above the fill line,
- E. not agitate solvent to the point of causing splashing.

Sources on which a control device was installed to comply with **MCAPCO Regulation 2.0518 - “Miscellaneous Volatile Organic Compound Emissions”** Paragraph (d) (now repealed) shall continue to maintain and operate the control device providing at least 85% control efficiency, unless the Director determines that the removal of the control device shall not cause or contribute to a violation of the ozone ambient standard.

S-5. The facility shall be operated in accordance with **MCAPCO Regulation 2.0967 - “Miscellaneous Metal and Plastic Parts Coatings”** such that emissions of volatile organic compounds before control for baked surface coating of reconditioned drums shall not exceed:

- A. For interior coating:
 - 4.2 lb VOC/gal coating; and,
 - 9.78 lb VOC/gal solids; and,
- B. For exterior coating:
 - 3.5 lb VOC/gal coating; and,
 - 6.67 lb VOC/gal solids.

EMISSION LIMITS

S-6. The facility shall be operated in accordance with **MCAPCO Regulation 1.5236 - “Synthetic Minor Facilities”**, such that facility-wide emissions during any consecutive 12-month period shall be less than:

► 100 tons for the following pollutant(s):

- particulate matter less than 10 microns (PM₁₀)
- particulate matter less than 2.5 microns (PM_{2.5})
- volatile organic compounds (VOCs)

► and 10 tons for any hazardous air pollutant (HAP) which has been listed pursuant to Section 112(b) of the Clean Air Act, and 25 tons of any combination of such HAPs.

Emissions for the above-referenced pollutant(s) shall be determined using one or more of the following methods as applicable:

1. Emission rates and control efficiencies obtained through MCAQ-approved emission source testing;
2. Material (mass) balance based on product usage;
3. Emission factors or rates found in the latest edition of the “Compilation of Air Pollutant Emission Factors”, EPA document AP-42;
4. Other emission factors or rates as approved by MCAQ.

Air emissions emanating from activities exempted from permitting pursuant to **MCAPCO Regulation 1.5211 - “Applicability”** subparagraph (g)(2) shall be considered when determining compliance with facility wide limits. The emissions limitation was requested by the facility to preclude a categorical determination as a “major facility” and the requirements of **MCAPCO Section 1.5500 - “Title V Procedures”, Section 2.0900 – “Volatile Organic Compounds”**.

MONITORING AND RECORDKEEPING REQUIREMENTS

S-7. In accordance with **MCAPCO Regulations 1.5111 - “General Recordkeeping, Reporting and Monitoring Requirements”** and **2.0605 – “General Recordkeeping and Reporting Requirements”** the facility shall monitor and record the following operating parameters for the emission sources and/or control devices as listed below:

EMISSION SOURCE	OPERATING PARAMETER	PARAMETER RANGE	MINIMUM MONITORING FREQUENCY (Once per...)
Drum Furnace Operation	Secondary chamber temperature	Min. temperature = 1600°F	Continuous
	Number of drums processed	≤200 drums/hour	Daily
	Number of hours the furnace was in operation (excluding down time for breaks, maintenance, etc.)	Hours of operation/day	Daily
	Calculations documenting the daily average number of drums/hour	Show calculations	Daily
Shot Blasting Operation (ES-05)	<ul style="list-style-type: none"> ▪ Pressure Drop Across the Fabric Filter ▪ Visible Emissions Observation 	<ul style="list-style-type: none"> ▪ 0.5-6 inches H₂O ▪ <20% 	Monthly
Shot Blasting Operation (ES-06)	<ul style="list-style-type: none"> ▪ Pressure Drop Across the Fabric Filter ▪ Visible Emissions Observation 	<ul style="list-style-type: none"> ▪ 2-8 inches H₂O ▪ <20% 	Monthly

The facility shall maintain the above-specified operating records as well as any maintenance records for activity conducted on the equipment for a period of not less than 2 years, unless otherwise specified by the permit. The records shall be available for inspection by MCAQ personnel upon request.

- S-8. The Shot Blasting Operations (CD-05 and CD-06) and Drum Furnace (CD-07) shall be operated concurrently with the associated control device(s) specified in this Permit to Construct/Operate except when:
- ▶ subject to the provisions of **MCAPCO Regulation 2.0535 - “Excess Emissions Reporting and Malfunctions”**; or,
 - ▶ during such times as allowed by **MCAPCO Regulation 2.0515**.
- The facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution.
- S-9. By authority of **MCAPCO Regulation 1.5104 - “General Duties and Powers of the Director, with the Approval of the Board”**, the drum reclamation furnace shall be maintained and operated in compliance with the following conditions:
- A. The drum reclamation furnace shall be equipped with a continuous operational temperature monitor and recorder for the secondary chamber (afterburner). The monitors and recorders shall be installed, calibrated, tested, maintained and operated to measure and record the operating parameters of the drum furnace. All recorded data shall be kept on file for a period for at least two years and be made available to MCAQ upon request.
 - B. The following minimum temperature shall apply at all times drums are being processed including startup and shutdown:
Minimum Temperature
 - Secondary chamber (afterburner) 1600 degrees Fahrenheit
 - C. The fuel used shall be natural gas;
 - D. The retention time in the secondary chamber (afterburner) shall be a minimum of 1.0 seconds; and
 - E. The drum reclamation furnace shall be operated at an average daily rate of no greater than 200 drums per hour.

PERFORMANCE TESTING REQUIREMENTS

- S-10. The facility shall, at its own expense and using the most recent versions of the performance test methods contained in 40 CFR Part 60 (Appendix A) or Part 63 or as approved by the Administrator of the USEPA or MCAQ, demonstrate compliance with the appropriate regulatory requirement as follows:

EMISSION SOURCE DESCRIPTION AND ID	DEMONSTRATE COMPLIANCE WITH...	SCHEDULED TESTING FREQUENCY
Shot Blasting Operations (ES-5 and ES-6)	MCAPCO Regulation 2.0515 – “Particulates from Miscellaneous Industrial Processes”	Initial Test: within 180 days after initial startup of the emission source or following any modification to the emission source or control device Additional Tests: upon written request by MCAQ

All performance tests shall be made by, or under the direction of, a person qualified by training and/or experience in the field of air pollution testing. MCAQ shall be notified at least 30 days in advance of the proposed performance test so that it may have a representative present to observe the test at its option. The notification shall include a detailed description of the performance test procedures so that MCAQ may review and approve them. The final performance test results shall be submitted to MCAQ for review within 60 calendar days after completion of on-site testing. The performance test(s) specified in this condition do not preclude MCAQ from requesting performance testing for other emission sources or for other purposes as defined in **MCAPCO Regulation 1.5104 - “General Duties and Powers of the Director, With the Approval of the Board”**, and referenced in General Condition and Limitation No. G-6 of this Permit.

NOTIFICATION AND REPORTING REQUIREMENTS

- S-11. The facility shall be operated in accordance with **MCAPCO Regulations 1.5111 - “General Recordkeeping, Reporting and Monitoring Requirements”, 2.0605 – “General Recordkeeping and Reporting Requirements”, and/or 2.0903 - “Recordkeeping: Reporting: Monitoring”** and **MCAPCO Regulation 1.5236 - “Synthetic Minor Facilities”**, such that the following specific reports and/or notifications shall be submitted to MCAQ by the specified dates:

(1) NOTIFICATIONS TO MCAQ

POLLUTANT/ PARAMETER	NOTIFICATION REQUIREMENT	SUBMITTAL DATE
VOCs regulated under MCAPCO 2.0900	For each new coating or solvent, calculations that demonstrate compliance with the applicable VOC standard (pounds VOC/gallon solids)	20 days prior to initial use
Performance test notification report	Detailed description of the proposed test procedures to be used on S-10.	30 days prior to proposed test date
PM ₁₀ , PM _{2.5} , VOC, HAP	Submit notification upon exceedance of the synthetic minor emission limitations specified in Specific Condition and Limitation No. S-6.	Within 2 business days of the exceedance discovery

(2) REPORTS TO MCAQ

POLLUTANT/ PARAMETER	REPORTING REQUIREMENT*	EMISSION PERIOD (For previous)	SUBMITTAL DATES (Postmarked by)
PM (PM ₁₀ , PM _{2.5}) VOC HAPs TAPs SO ₂ NO _x CO	A report of facility-wide emissions (in tons) emanating from the emission sources listed on this permit to include, at a minimum, the following information: 1. All supporting documentation, including emission calculations. (Calculations for previously submitted periods do not need to be re-submitted) 2. The annual amount of Natural Gas used by the drum furnace and curing ovens associated with the 'Surface Coating Operation'. 3. The hours of operation for each emission source and the total hours the facility operated for the year. 4. VOC, HAP, TAP emissions to include for each coating used on the coating lines and each miscellaneous product: a. Product Name and type b. VOC, HAP and TAP content c. Annual amount (gallons) used	12 months	April 30, July 30, October 30, January 30
Drum Furnace Operation	The daily average of drums processed by the drum furnace each day		
Performance Test Report	Results of Performance Test Conducted	Not applicable	Within 60 days after test
Appendix B: Insignificant Activities	Refer to Appendix B: Insignificant Activities Table for additional recordkeeping and reporting requirements.		



APPENDIX A: TOXIC AIR POLLUTANT REVIEW

Facility Name: Industrial Container Services – NC, LLC (Matthews)

Facility Address: 3212 Campus Ridge Road, Matthews, NC 28105

Date Issued: May 9, 2012

The above-referenced facility has not had a process modification since May 1, 1990 or been subject to a SIC call by MCAQ. Therefore, a review of toxic air pollutant emissions has not been required under MCAPCO Section 1.5700 - "Toxic Air Pollutant Procedures."

Reviewed Toxic Air Pollutant (TAP)	CAS No.	Toxic Permit Emission Rate (TPER) as listed in MCAPCO Regulation 1.5711 - "Emission Rates Requiring a Permit"				Is TAP also a Hazardous Air Pollutant (HAP)?	Compliance Demonstration Method	
		lb/year	lb/day	lb/ hour	lb/ hour		Actual Emission Rate Below TPER?	Air Dispersion Modeling Conducted?
None								



APPENDIX B: INSIGNIFICANT ACTIVITIES TABLE

Facility Name: Industrial Container Services – NC, LLC (Matthews)

Facility Address: 3212 Campus Ridge Road, Matthews, NC 28105

Date Issued: May 9, 2012

INSIGNIFICANT ACTIVITIES DUE TO SIZE AND PRODUCTION RATE

Operation of the following processes/equipment are exempted from permitting pursuant to MCAPCO Regulation 1.5211 - “Applicability” Subparagraph (g)(2), but are considered when determining compliance with facility-wide limits. For facilities with facility-wide emission limits, recordkeeping and reporting may be required, as listed below, pursuant to MCAPCO Regulation 1.5104 - “General Duties and Powers of the Director, With the Approval of the Board” and 1.5236 - “Synthetic Minor Facilities.”

Process/Equipment	Exemption Reference and Explanation	Recordkeeping/Reporting Requirements	Submittal Date (No Later Than...)
One 2.5 million Btu/hr indirect natural gas-fired bake oven	MCAPCO 1.5211, Subpart (g)(2)(B)(ii): Fuel combustion equipment firing exclusively natural gas with a heat input rating less than 65 million Btu per hour	Number of hours operated and amount of fuel used for each emergency generator for the calendar year	April 30 of the following year

INSIGNIFICANT ACTIVITIES DUE TO CATEGORY

Operation of the following processes/equipment are exempted from permitting pursuant to MCAPCO Regulation 1.5211 - “Applicability” Subparagraph (g)(1). There are no recordkeeping or reporting requirements associated with these activities.

Process/Equipment	Exemption Reference and Explanation
One maintenance parts washer	MCAPCO 1.5211, Part (g)(1)(A): “Maintenance, Upkeep and Replacement”

ACTIVITIES EXEMPTED DUE TO FACILITY POTENTIAL

Operation of the following processes /equipment are exempted from permitting for the pollutant(s) indicated pursuant to MCAPCO Regulation 1.5211 - “Applicability” Paragraph (f). Facility-wide potential emissions of the listed pollutant are less than five tons annually. There are no recordkeeping or reporting requirements associated with these pollutants.

Process/Equipment	Pollutant Emitted
None	